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HOWARD E. JANZEN
VICE PRESIDENT
OPERATIONS

91 NOV 25 AM 9:04 November 21, 1991

RSPA-98-4868-22

Mr. Ceasar de Leon
Dockets unit, Room 8417
Research & Special Programs Administration
U.S. Department of Transportation
400 Seventh Street, S.W.
Washington, D.C. 20590

SUBJECT: RSPA Gathering Line Definition
Docket No. PS-122-Notice 1 - NOPR

Dear Mr. De Leon:

Williams Natural Gas Company (WNG) comments are offered in support of our rationale to establish a clear definition for gathering lines. Four direct questions addressed in the proposed NOPR and our corresponding comments follow:

(1) Question

Is the term "adjacent" adequate criteria to ^{USC} in identifying the end of the gathering line for adjacent fields?

Answer

Yes

(2) Question

How many additional miles would be reclassified as transmission under the proposed NOPR?

Answer

Approximately 270 miles

(3) Question

What are the estimated costs associated with the reclassification in order to continue operating the pipelines as usual.

Answer

Approximately \$15 million excluding additional O&M costs

(4) Question

Have any of these pipelines been the subject of dispute between WNG and the State or Federal enforcement personnel?

Answer

DOT State enforcement personnel questioned WNG about the possible reclassification of one pipeline system used to transport gas from a receipt point. This pipeline was recently reclassified as transmission in WNG's FERC rate proceedings.

Two additional comments regarding the jurisdictional issue and the need for a clear definition of a "processing plant" follows.

Jurisdictional Issue

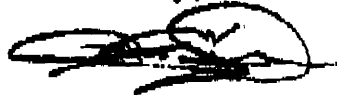
WNG continues to support the elimination of any reference in the proposed NOPR to "Jurisdiction" or "Non-Jurisdictional" terms. Paragraph 4(iii) of the subject NOPR is an effort to match DOT's facility classification to FERC's facility classification. The purposes of FERC's facility classification (certificate jurisdiction) has no bearing or relationship to the purposes of DOT's facility classification (safety jurisdiction). WNG recommends that Paragraph 4(iii) be modified to state "In any interstate transmission facility."

Processing Plant

A clear definition needs to be added to the proposed NOPR that addresses "Processing Plants." Processing as a general term can include the removal of water vapor, CO₂, H₂S, heavy hydrocarbons or other impurities in the natural gas stream. The natural gas process residue stream should be considered pipeline quality if all impurities are removed at a central processing location. Definitions for processing plants and treating plants should be integrated for reclassification purposes because the residue natural gas stream should generally be pipeline quality gas ready for direct customer consumption.

We believe WNG's suggested comments are consistent with prior correspondence on this matter. Should you need additional comments or other information regarding the proposed gathering definition, please call Roy Rice, Director of Engineering, at 918-588-3896 or my office at 918-588-3800.

Sincerely,

A handwritten signature in dark ink, appearing to be "Roy Rice", written over a horizontal line.